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**MEMO ENDORSED**

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March 30, 2007

**BY FACSIMILE**

The Honorable James C. Francis IV  
United States Magistrate Judge, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1960  
New York, New York 10007-1312

Re: *Abdell, et al. v. City of New York, et al.* 05 CV 8453 (KMK)(JCF)  
*Adams, et al. v. City of New York, et al.* 05-CV-9484 (KMK)(JCF)

LEAD CASE  
04 Civ 7922 (KMK)  
(JCF)

Docket IN  
BOTH CASES

Dear Judge Francis:

Defendants write to request a brief enlargement of time in which to respond to plaintiffs' March 15, 2007 letter seeking costs and attorneys fees associated with a discovery issue in these cases. Pursuant to an agreement reached during the March 16, 2007 RNC status conference, the parties agreed that defendants' response would be provided on or before March 30, 2007. Defendants seek an additional week to prepare their response, which would make their response due on or before April 6, 2007. Plaintiff's counsel Martin Stolar has kindly consented to this enlargement - defendants have been informed that Mr. Spiegel is on vacation. Defendants also consent to a one week enlargement for plaintiffs' reply (if they so require), which is currently due on or before April 13, 2007.

Accordingly, defendants request that the Court enter an order that defendants opposition letter is due on or before April 6, 2007 and that plaintiffs also be granted a one week enlargement so that they may submit their reply on or before April 20, 2007. Thank you.

Respectfully submitted,

*Jeffrey A. Dougherty*  
Jeffrey A. Dougherty

cc: Michael L. Spiegel, Esq. (by Facsimile)  
Martin Stolar, Esq. (by Facsimile)

4/2/07  
Application granted.  
so ORDERED.  
*James C. Francis IV*  
*JCF*